

1 THE O'MARA LAW FIRM, P.C.
2 DAVID C. O'MARA, SBN 8599
3 311 E. Liberty Street
4 Reno, Nevada 89501
5 Telephone: (775)323-1321
6 Facsimile: (775)323-4082
7 E-mail: info@omaralaw.net

8 *Attorneys for Plaintiffs*

9 UNITED STATES DISTRICT COURT
10 FOR THE DISTRICT OF NEVADA

11 DANIEL SMALL, CAROLYN
12 SMALL, WILLIAM CURTIN, DAVID
13 COHEN, LANETTE LAWRENCE and
14 LOUISE COLLARD, Individual and on
15 Behalf of All Other Persons Similarly
16 Situated,

17 Plaintiffs,

18 v.

19 UNIVERSITY MEDICAL CENTER
20 OF SOUTHERN NEVADA, a political
21 subdivision of Clark County, State of
22 Nevada, CLARK COUNTY, a political
23 subdivision of the State of Nevada, and
24 JOHN ESPINOZA, an individual,

25 Defendants.

Case No.: 2-13-cv-0298-APG-PAL

**JOINT STIPULATION AND
~~[PROPOSED]~~ ORDER SETTING
BRIEFING SCHEDULE FOR
DEFENDANTS' MOTION
DISMISS**

26 IT IS HEREBY STIPULATED AND AGREED by plaintiffs Daniel Small,
27 Carolyn Small, William Curtin, David Cohen, Lanette Lawrence, and Louise
28 Collard (collectively "Plaintiffs") and defendants University Medical Center of
Southern Nevada and John Espinoza ("Defendants"), through their respective
counsel, as follows:

1 WHEREAS, on February 22, 2016, defendant University Medical Center of
2 Southern Nevada filed its motion to dismiss Plaintiffs' third amended class action
3 complaint ("Motion");

4 WHEREAS, on March 2, 2016, defendant John Espinoza filed a joinder to
5 the Motion which included arguments that further elaborated on those set forth in
6 the Motion;

7 WHEREAS, counsel for Defendants and Plaintiffs have met and conferred
8 and agreed to the briefing schedule for the Motion.

9 **STIPULATION**

10 NOW, THEREFORE, the Parties, through their respective counsel of record,
11 hereby respectfully stipulate and request as follows:

12 IT IS STIPULATED, BY AND BETWEEN THE PARTIES, AS
13 FOLLOWS:

- 14 1. The Opposition to the Motion shall be filed no later than March 23,
15 2016; and
16 2. The Reply to the Motion shall be filed no later than April 6, 2016;


17
18 IT IS SO STIPULATED.

19
20 Dated: March 7, 2016

THE O'MARA LAW FIRM, P.C.

21
22 **SO ORDERED.**

By: /s/ David C. O'Mara
David C. O'Mara

23 
24 UNITED STATES DISTRICT JUDGE
25 Dated: March 9, 2016.

311 E. Liberty Street
Reno, Nevada 89501
Telephone: (775)323-1321
Facsimile: (775)323-4082

Attorneys for Plaintiffs

26
27
28 JOINT STIPULATION AND [PROPOSED] ORDER SETTING
BRIEFING SCHEDULE FOR DEFENDANT'S MOTION TO DISMISS

1
2 Dated: March 7, 2016

LEWIS BRISBOIS BISGAARD & SMITH
LLP

3
4
5 By: /s/ Margaret Foley

Margaret Foley

6
7 6385 S. Rainbow Boulevard, Suite 600

Las Vegas, Nevada 89118

8 Telephone: (702) 863-3383

9 Facsimile: (702) 893-3789

10 *Attorneys for Defendants*

11 **IT IS SO ORDERED.**

12
13 DATED: _____

14 _____
Honorable Andrew P. Gordon

15 United States District Court Judge
16
17
18
19
20
21
22
23
24
25
26
27
28

JOINT STIPULATION AND [PROPOSED] ORDER SETTING
BRIEFING SCHEDULE FOR DEFENDANT'S' MOTION TO DISMISS